

EXHIBIT A

From: Gary I. Blackman
Sent: 12/18/2023 2:24:01 PM
To: Ilya Zlatkin
Cc: Dean Niro; Art Gasey; Gary I. Blackman
Subject: Re: Action/MFB [LP-ACTIVE.44919.44919-137461.FID1364752]

Agreed. We're working on the answer/response this week and next. It's not our intention to delay that. Just don't want you looking for a response today. Thanks and have a good holiday.
Gary

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On Dec 18, 2023, at 2:20 PM, Ilya Zlatkin <ilya@zce.law> wrote:

Hi Gary,

I'm certainly not trying to put you guys into any sort of "jackpot" with response deadlines. There hasn't been any minute entry relating to deadlines for the counterclaims, so it's all just Federal Rules of Civil Procedure with respect to those right now.

My primary concern is not having any further delay due to pre-discovery motions being filed at a later date regarding the counterclaims. So, if you're just planning to file an answer to the counterclaims, then I'm happy enough to wait for the court to set a deadline for that. If, on the other hand, you're planning to file any motions, then I would like for you to do so sooner than later, because if you're going to file (for example) a motion to dismiss the claims months down the line, then that'll further delay the adjudication of the case, which I think will prejudice my client.

Best,
Ilya

--

ILYA G. ZLATKIN

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From: Gary I. Blackman <gblackman@lplegal.com>

Sent: Monday, December 18, 2023 1:55 PM

To: Ilya Zlatkin <ilya@zce.law>

Cc: Dean Niro <dniro@vvnlaw.com>; Art Gasey <gasey@vvnlaw.com>

Subject: Action/MFB [LP-ACTIVE.44919.44919-137461.FID1364752]

Hi Ilya, I see we are still waiting for the judge to rule on Art's motion to amend. With all the back and forth I may have lost the thread on the counterclaim response date. If you were expecting it today we won't be able to meet that deadline. I'm leaving for Fla. tomorrow to see my (elderly) in-laws and will be back on Friday. Can you let us know your position on the CC response date, i.e., whether you still expect the CC to stay the same even if an amended complaint is filed. Thanks



Gary I. Blackman

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